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February 12, 2020

District Judge Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: 1:19-cv-08975-PGG
Parham v. Aldi Inc.

Dear District Judge Gardephe:

This office represents the plaintiff. In accordance with your Honor's Individual Rules of Practice in Civil Cases, plaintiff, jointly and with consent of defendant, requests an extension of the date by which defendant is required to answer or respond to the complaint, scheduled for Tuesday, February 18, 2020, to Friday, April 3, 2020.

There have been no previous requests for an extension of the date by which defendant is required to answer or respond to the complaint. No prior request was granted or denied. Defendant consents to and joins plaintiff in this request. The reason for this request is because defendant is finalizing assignment and retention of outside counsel which is expected to be completed within approximately ten days.

Upon assignment of counsel and their review of the file, the parties will use this additional time for discussion regarding how they will proceed, such as a motion to dismiss or answer by defendant, an amended complaint by plaintiff or a resolution of the issues, in advance of the date by which defendant's answer or response to the complaint is due. This request is submitted at least 48 hours prior to the original compliance date. This request does not affect any other scheduled dates. Thank you.

Respectfully submitted,

/s/Spencer Sheehan
Spencer Sheehan

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Dated: Feb. 21, 2020